

#### WEBSITE PRIVACY POLICY

#### 1 THE AIMS OF THIS STATEMENT

This page is aimed at describing the website's administrative procedures concerning the processing of its users' personal data.

This statement is produced pursuant to <u>Art. 13 of Legislative Decree no. 196/2003 – Personal Data Protection</u> Code for those users who interact with the <u>web</u> services of

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accessible by internet starting from the pages www.caen.it and its alias, (<a href="www.aurelia-micro.it">www.caen-it</a>, www.caentechnologies.com, www.caenrfid.it, www.caenels.com) (hereinafter the "SITES")

This statement only concerns the website of

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and not other websites that the user may consult through the use of link.

This statement is prompted by Recommendation no. 2/2001 implemented on 17 May 2001 by the European authorities for personal data protection, brought together in the Working Party established by <u>Art. 29 of Directive no. 95/46/EC</u> in order to identify several minimum requisites for the collection of personal data online, and, in particular, the procedures, times and the nature of the information that data controllers must supply users when the latter connect to web pages, regardless of the purposes of connection.

#### **2 THE DATA CONTROLLER**

For the updated list of Data controller and data processors see the Data controllers and data processors List

# 3 TYPES OF PERSONAL DATA AND PURPOSES FOR THEIR PROCESSING

## 3.1 Navigation data

The computer systems and software procedures in charge of the website's operation acquire, during their normal operation, some personal data (so-called log files) the transmission of which is implicit in the use of internet communication protocols.

This information is not collected in order to be associated to identified data subjects, but due to its same nature can, by means of processing and integration with data held by third parties, allow users to be identified.

This category includes the IP addresses or domain names of the computers used by the users to connect to the website, URI (Uniform Resource Identifier) form addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the reply given by the server (done, error, etc.) and other parameters concerning the user's operating system and computer environment.

These data are used with the sole purpose of obtaining anonymous statistical information concerning the use of the site and to check its correct operation. These data can be used to ascertain responsibility in the case of hypothetical computer crimes to the detriment of the website and can be communicated to the Judicial Authority, in the event that the latter explicitly requests such data.

#### 3.2 Cookies

No personal data concerning users are acquired by the website through cookies.

Cookies are not used to transmit information of a personal nature, nor are user-tracing and identification systems used.

The use of the so-called session cookies (that, in any case, are not stored persistently on the user's computer and are deleted automatically as soon as the browser is shut down) is strictly limited to the purpose of transmitting data (made up of random numbers created by the server) identifying the specific session and necessary to allow a safe and efficient website surfing.

The so-called session cookies used in this website avoid any other computer methods that could potentially compromise the privacy about users'web-surfing and they do not make it possible to obtain personal data identifying the specific user.



#### 3.3 Data supplied by the user

#### 3.3.1 Data supplied voluntarily by the user

The optional, explicit and voluntary dispatching of electronic mail to the addresses indicated in this website entails the subsequent acquisition of the sender's address, necessary in order to reply to the requests, and also any other personal data contained in the message.

## 3.3.2 Registration and request forms

Personal data required by registration and request forms are subdivided into two categories: obligatory and optional, as illustrated in the procedures for activation of the services offered

The provision of the obligatory data and the related handling for the purposes indicated above is strictly functional to the performance of the indicated services. The eventual refusal of the User to provide such data or the eventual refusal to agree to their handling will make it impossible to utilise the service offered

The other data collected serve to help

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to offer an ever better service. With regards to these data, the User is free to supply them or not.

The personal data collected through the registration procedures shall be stored on electronic databases belonging to

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#### 3.4 Processing Data supplied by the user

Excepting for that specified for navigation data above, personal data are subject to all the handling operations outlined in the Legislative Decree 196/2003 - that is to collection, recording, organisation, storage, elaboration, modification, selection, extraction, comparison, utilisation, interconnection and any other operation useful for the provision of the requested services, including the communication to third parties, where necessary - through automated and computerised procedures. The data may also be organised in databases or archives.

More specifically the provided data will be used for the following purposes;

- statistical processing in order to analyze customers profile;
- supplying the scheduled services;
- sending newsletters;
- - sending invitation to workshop events or initiatives on the SITES;
- - sending through e-mail and/or attached to the invoice/offer advertising material;
- carrying interactive communications;

In any case, the data and/or information will not be used by for any other scope different from that which has been indicated.

The personal data acquired may be communicated to all employees, collaborators and consultants of the companies:

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For the same purposes, personal data can be communicated to people, to companies, to commercial partners, to associations that provide services and assistance to

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Always in respect of the purposes of the handling indicated above

It must be remembered that in some cases (not object of the ordinary administration of this website) the Authority can request information pursuant to <u>Art. 157 of Legislative Decree no. 196/2003</u>, for the purposes of checking personal data processing. In these cases reply is obligatory under penalty of a fine.

# 4. WHERE DATA PROCESSING TAKES PLACE

The processing operations connected to the web services of this website take place at the above-mentioned offices of

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and are carried out only by technical personnel of the Department in charge of processing, or by persons in charge of occasional maintenance operations.



## 5. DATA PROCESSING PROCEDURES

The processing of the information is made with the help of electronic, paper and telecommunication means, or with any other means that guarantee the privacy of the data.

## 6. DATA SUBJECTS' RIGHTS

We inform you that you will be able to exercise the rights of art. 7, D.Lgs 196/2003 by means of a written request to be sent to the following address:

• - CAEN S.p.A. Ufficio Comunicazione, via Vetraia, 11 - 55049 Viareggio (LU)

or by sending an email to <a href="mailto:privacy@caen.it">privacy@caen.it</a>. Indicating your request.

Your rights include: to receive confirmation of the existence of your personal data; to know its provenance as well as the reasoning and purpose of its processing; to obtain its cancellation, its transformation into anonymity or the block of the data treated in violation of the law, as well as its updating, its amendment or its integration, if it is of interest; to oppose the processing, for legitimate purposes; to oppose the use of this data for commercial, advertising or marketing information

#### Data controllers and data processors List

Company	Data Controller	Data Processor	Location
CAEN S.p.A.	Givoletti Marcello	Vivaldi Franco Zanetti Elisabetta	via Vetraia, 11 - 55049 Viareggio (LU)